City of Bellevue
Development Services Department
Land Use Staff Report

Proposal Name:	COBT Rockery Replacement
Proposal Address:	East side of 150th Ave SE
Proposal Description:	The City of Bellevue Transportation Department (COBT) proposes to replace an existing rockery wall along the east side of 150th Ave SE with an engineered gravity block wall. The new wall would extend approximately 1,000 linear feet north from the intersection of 150th Ave SE and SE Newport Way to 4005 151st Ave SE. The existing adjacent curb and asphalt walkway will be replaced with a new concrete curb, gutter and sidewalk. The proposal would impact approximately 6,335 SF of steep slope critical area. Tree replacement mitigation is proposed in the Eastgate Open Space.
File Number:	19-102850-LO
Applicant:	Daniel Lam, City of Bellevue Transportation Department
Decisions Included	Critical Areas Land Use Permit (Process II. 20.30P)
Planner:	Peter Rosen, Senior Environmental Planner
State Environmental Policy Act Threshold Determination:	**Determination of Non-Significance** Elizabeth Stead, Environmental Coordinator Development Services Department
Director's Decision:	**Approval with Conditions** Michael A. Brennan, Director Development Services Department By: _____ Elizabeth Stead, Land Use Director

Application Date:	January 7, 2019
Notice of Application Date:	January 24, 2019
Decision Publication Date:	March 21, 2019
Project Appeal Deadline:	April 4, 2019

For information on how to appeal a proposal, visit Development Services Center at City Hall or call (425) 452-6800. Appeal of the decision must be received in the City's Clerk's Office by 5 PM on the date noted for appeal of the decision.

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Attachments

1. Project Impacts Plans– Attached
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I. Proposal Description

The City of Bellevue Transportation Department (COBT) proposes to replace and expand an existing rockery wall along the east side of 150th Ave SE with an engineered gravity block wall. A geotechnical investigation was conducted on the existing rockery and it was recommended for immediate replacement as it poses a risk to public safety. The new wall would extend approximately 1,000 linear feet north from the intersection of 150th Ave SE and SE Newport Way to 4005 151st Ave SE (along the parcel's frontage on 150th Ave SE). See Figure 1- Project Location.

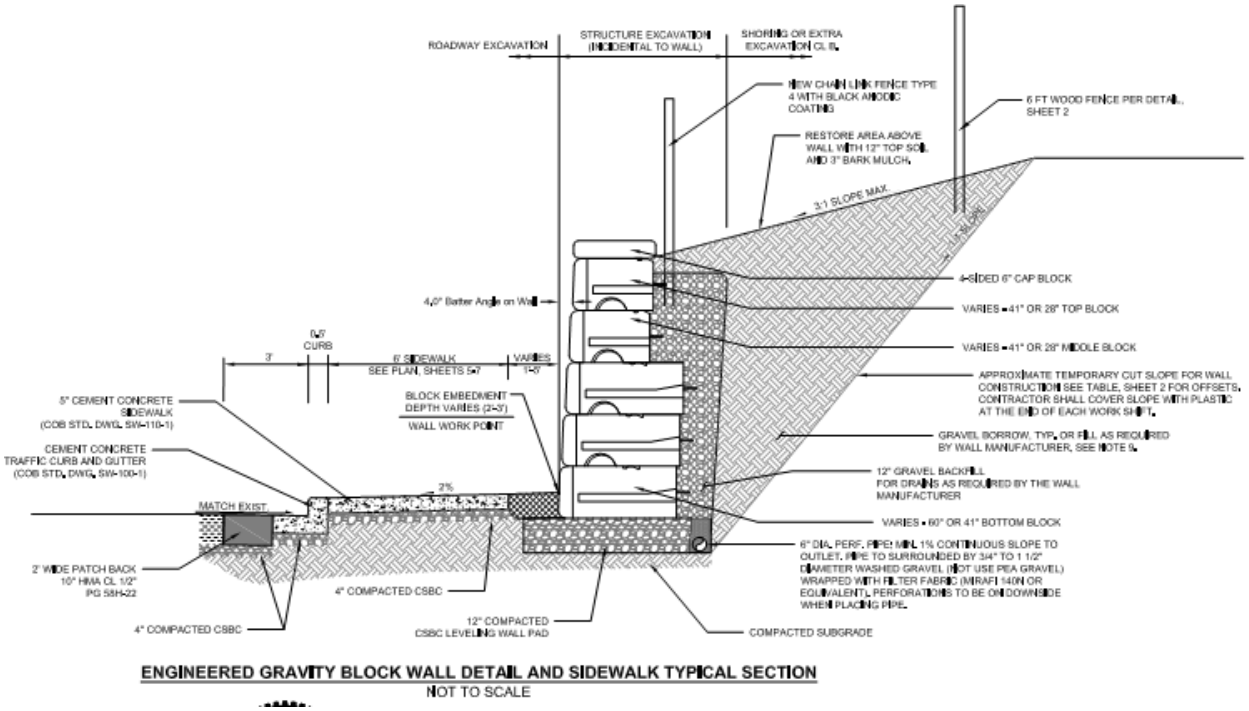
The constructed project is located entirely within the street right-of-way, though construction activity associated with the wall would extend onto adjacent residential properties. Temporary construction easements will need to be acquired from adjacent residences to construct the project.

Figure 1 – Project Location

The existing curb and 4-foot wide asphalt walkway adjacent to the rockery would be replaced with a new concrete curb, gutter and a 6-foot wide sidewalk. The new block wall height would be approximately 1 to 8 feet above grade. See Figure 2 – Wall and Sidewalk Section.

There would be an estimated 1,500 cubic yards (CY) of material removed from the site to construct the new engineered wall and to replace the asphalt walkway and curb, and approximately 1,500 CY of fill material for backfilling the new engineered wall and grading the new slope behind the proposed wall.

Figure 2 – Wall and Sidewalk Section



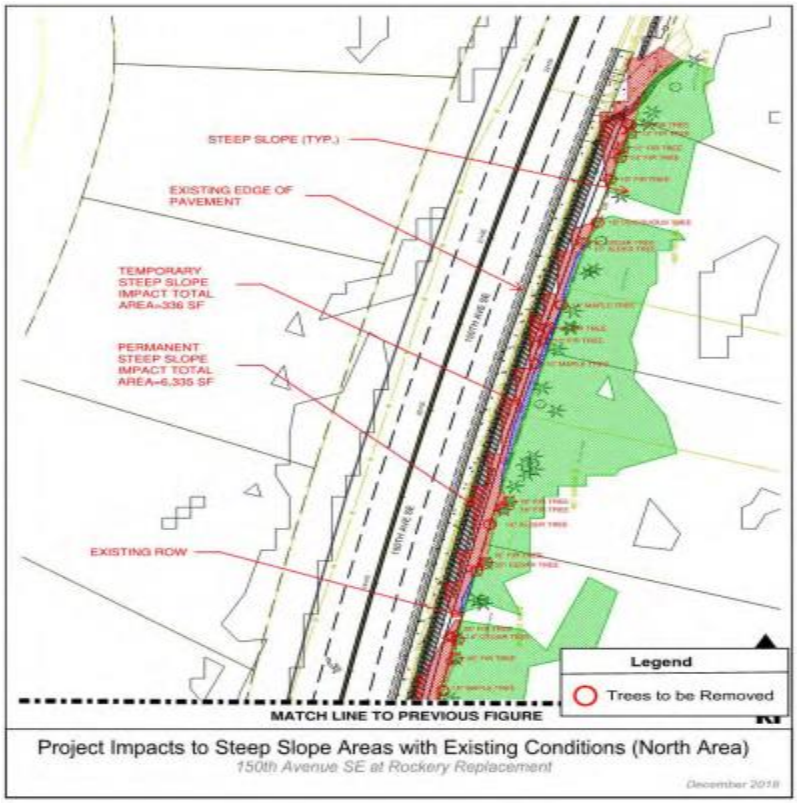
ENGINEERED GRAVITY BLOCK WALL DETAIL AND SIDEWALK TYPICAL SECTION
NOT TO SCALE

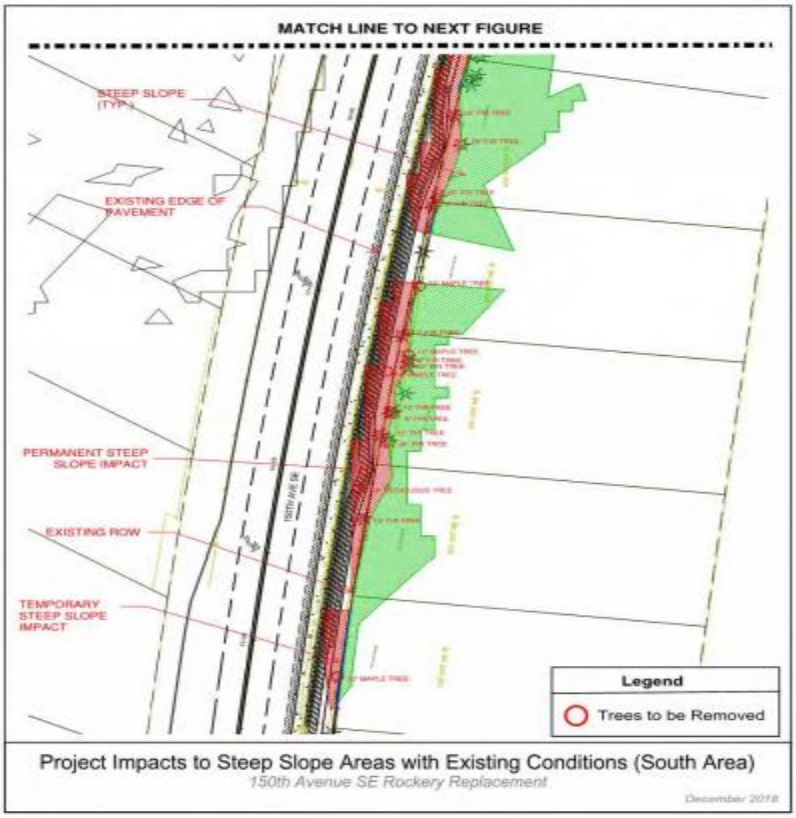
The rockery replacement and installation of a gravity block wall would result in approximately 6,335 SF of permanent impacts and 336 SF of temporary construction impacts to steep slope critical areas (slopes over 40%), as summarized below. See Figure 3 and Attachment 1.

Table 3. Project Impacts

Area and Type of Impact	Size
Temporary Impact – Within Steep Slopes (square feet)	336
Permanent Impact – Within Steep Slopes (square feet)	6,335
Total Steep Slope Impact (square feet)	6,671
Total Disturbed Area (square feet)	16,500
Excavation / Fill (cubic yards)	1,500
New/Replaced Impervious Surface (square feet)	2,300/6,850

Figure 3 – Project Impacts





Tree Impacts and Mitigation

The project construction would impact trees within the steep slope area; a total of 38 significant trees would be removed. This includes trees within the road right-of-way as well as trees adjacent to the right-of-way on residential properties, which require removal for the construction of the new block wall and sidewalk. See Attachment 2 - Significant Tree Removal Plans.

To mitigate for the tree removal impacts, a total of 76 trees would be planted. The following table shows the tree removal by the tree size and shows the tree replacement ratios, which are based on the size of the impacted trees.

Table 4. Steep Slope Tree Removal by Size and Location.

Steep Slope Area	Trees Removed Conifers 18+" DBH	Trees Removed 12 to <18" DBH[1]	Trees Removed 8 to <12" DBH	Total Trees Removed or Replaced
Total Trees Removed	12	14	12	38
Mitigation Ratio for Tree Replacement	3:1	2:1	1:1	
Mitigation Tree Replacement Number	36	28	12	76

1) Also includes deciduous trees with a DBH greater than 12 inches

Because the build-out design occupies most of the 150th Ave SE right-of-way, there are no opportunities for tree replacement within the right-of-way. The tree replacement/mitigation would be located in City-owned Eastgate Park, which is located on SE Newport Way to the southwest of the project site. Eastgate Park and the mitigation area is currently dominated by deciduous forest with an understory of native shrubs and some invasive species (e.g. English ivy, Laurel sp.). The mitigation would plant 76 native conifer tree species (Western Red Cedar, Western Hemlock) to advance natural succession and provide greater species diversity which increases wildlife habitat niches. Trees would be planted at approximately 10-foot centers, but would be field located to take maximum advantage of natural openings in the existing forest canopy. The mitigation planting would be accomplished by hand to minimize impacts to existing trees and the forest understory. In addition, all invasive plant species would be removed from the planting area prior to installing the native trees. See Attachment 3, Tree Replacement Mitigation Plan.

Expansion of roads and improvements within public rights-of-way are allowed in critical areas/critical area buffers provided the proposal addresses applicable performance standards (LUC 20.25H.055). A Critical Areas Land Use Permit is required because the proposed project would expand the disturbance area and impact a steep slope critical area (LUC 20.25H.015.B).

II. Site Description, Zoning, Land Use and Critical Areas

A. Site Description

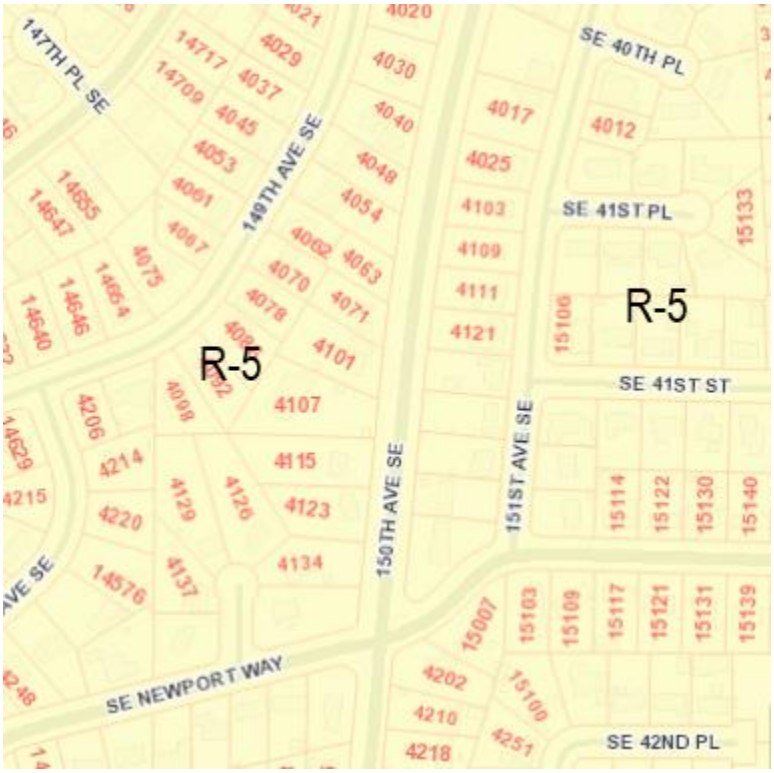
The project site is located on the east side of 150th Ave SE, north of the intersection with SE Newport Way. The project site includes the existing rockery and sidewalk with a steep slope vegetated with a mix of native conifer and deciduous trees above the rockery. English ivy (a non-native invasive plant species) covers major portions of the existing rockery and extends into the adjacent steep slope area.

Figure 4 – Site Photos

B. Zoning

The project area is surrounded by single-family zoning (R-5) and adjacent properties are improved with single family residences.

Figure 5 – Zoning Map



C. Land Use Context

The Comprehensive Plan designation for 150th Ave SE and adjacent properties is Single-Family High Density (SF-H). The proposal is consistent with the Land Use designation.

D. Critical Areas Functions and Values

i. Geologic Hazard Areas

Geologic hazards pose a threat to the health and safety of citizens when commercial, residential, or industrial development is inappropriately sited in areas of significant hazard. Some geologic hazards can be reduced or mitigated by engineering, design, or modified construction practices. When technology cannot reduce risks to acceptable levels, building in geologically hazardous areas is best avoided (WAC 365-190).

Steep slopes may serve several other functions and possess other values for the City and its residents. Several of Bellevue's remaining large blocks of forest are located in steep slope areas, providing habitat for a variety of wildlife species and important linkages between habitat areas in the City. These steep slope areas also

act as conduits for groundwater, which drains from hillsides to provides a water source for the City's wetlands and stream systems. Vegetated steep slopes also provide a visual amenity in the City, providing a "green" backdrop for urbanized areas enhancing property values and buffering urban development.

III. Consistency with Land Use Code Requirements:

A. Zoning District Dimensional Requirements:

Highway and Street Right-of-Way is a permitted use in all the residential zoning districts (LUC 20.10.440). Zoning dimensional requirements of the Land Use Code do not apply within public rights-of-way. The proposal is to construct a new wall within the right-of-way and no structures other than the engineered block wall are proposed.

B. Critical Areas Requirements LUC 20.25H:

The City of Bellevue Land Use Code Critical Areas Overlay District (LUC 20.25H) establishes performance standards and procedures that apply to development on any site which contains in whole or in part any portion designated as critical area, critical area buffer or structure setback from a critical area or buffer.

The proposed roadway wall replacement is an allowed use in critical areas, buffers, and setbacks, provided certain requirements are met. The project is subject to the performance standards found in LUC 20.25H.055.C below.

i. Consistency with LUC 20.25H.055.C.2.a

New or expanded facilities and systems are allowed within the critical area or critical area buffer only where no technically feasible alternative with less impact on the critical area or critical area buffer exists. A determination of technically feasible alternatives will consider:

1. The location of existing infrastructure;

Finding: The proposal is to replace an existing, failing rockery wall with an engineered block wall located within the road right-of-way. The adjacent 4-foot asphalt walkway needs to be widened to a minimum of 6-feet per the Transportation Design Manual, resulting in the proposed wall footprint encroaching into the steep slope area. The proposed location is the only feasible alternative to meet the project objective.

2. The function or objective of the proposed new or expanded facility or system;

Finding: The objective of the project is to replace an existing, failing rockery wall and to construct a new concrete curb, gutter and a 6-foot wide sidewalk.

3. Demonstration that no alternative location or configuration outside of the critical area or critical area buffer achieves the stated function or objective, including construction of new or expanded facilities or systems outside of the critical area;

Finding: There is no feasible alternative location to meet the project objective. Other potential alternatives to stabilize the steep slope are not feasible given the configuration of the road and adjacent, existing development. The proposal is to replace the existing rockery wall within the road right-of-way. The increased width and footprint of the new block wall and sidewalk requires expanding into the adjacent steep slope critical area.

4. Whether the cost of avoiding disturbance is substantially disproportionate as compared to the environmental impact of proposed disturbance; and

Finding: Impacts to the steep slope area could not be avoided since the steep slope is directly adjacent to the existing rockery wall. Replacement of the existing rockery is recommended for public safety.

5. The ability of both permanent and temporary disturbance to be mitigated.

Finding: The proposal would remove 38 trees from steep slope areas and mitigate the impact by planting 76 trees in Eastgate Park because there is no tree replacement area available within the existing road right-of-way. Areas of temporary disturbance will be revegetated.

A final mitigation plan is required to be submitted and approved with clearing and grading permit construction plans. The final mitigation plan shall show general planting locations, plant species, plant quantities and size of plant material, and shall include notes to direct in-fill plantings to minimize impacts to existing vegetation. The mitigation planting is required to be maintained and monitored for five years. The final mitigation plan shall include performance standards to measure the successful establishment of the mitigation plantings. **See Section X for a related condition of approval.**

ii. Consistency with LUC 20.25H.055.C.2.b

If the applicant demonstrates that no technically feasible alternative with less impact on the critical area or critical area buffer exists, then the applicant shall comply with the following:

1. **Location and design shall result in the least impacts on the critical area or critical area buffer;**
2. **Disturbance of the critical area and critical area buffer, including disturbance of vegetation and soils, shall be minimized;**
3. **Disturbance shall not occur in habitat used for salmonid rearing or spawning or by any species of local importance unless no other technically feasible location exists;**
4. **Any crossing over of a wetland or stream shall be designed to minimize critical area and critical area buffer coverage and critical area and critical**

area buffer disturbance, for example by use of bridge, boring, or open cut and perpendicular crossings, and shall be the minimum width necessary to accommodate the intended function or objective; provided, that the Director may require that the facility be designed to accommodate additional facilities where the likelihood of additional facilities exists, and one consolidated corridor would result in fewer impacts to the critical area or critical area buffer than multiple intrusions into the critical area or critical area buffer;

5. **All work shall be consistent with applicable City of Bellevue codes and standards;**
6. **The facility or system shall not have a significant adverse impact on overall aquatic area flow peaks, duration or volume or flood storage capacity, or hydroperiod;**
7. **Associated parking and other support functions, including, for example, mechanical equipment and maintenance sheds, must be located outside critical area or critical area buffer except where no feasible alternative exists; and**
8. **Areas of new permanent disturbance and all areas of temporary disturbance shall be mitigated and/or restored pursuant to a mitigation and restoration plan meeting the requirements of LUC 20.25H.210.**

Finding: The proposal is designed to minimize impacts to steep slope critical areas through use of a gravity block wall, as recommended for slope stability by the geotechnical engineer (Kleinfelder, November 12, 2018). The impacts are limited to steep slopes directly adjacent to and above the rock wall. The proposal would not disturb habitat used by salmonids or by species of local importance. No wetland or stream crossings are proposed, and the proposal would not have a significant adverse impact on aquatic area flow peaks, duration, volume or flood storage capacity. No parking or other support functions are proposed. Areas of permanent and temporary disturbance will be mitigated and restored meeting requirements of LUC 20.25H.210 .

iii. Consistency with LUC 20.25H.125 - Performance standards - Landslide hazards and steep slopes.

In addition to generally applicable performance standards set forth in LUC 20.25H.055 and 20.25H.065, development within a landslide hazard or steep slope critical area or the critical area buffers of such hazards shall incorporate the following additional performance standards in design of the development, as applicable. The requirement for long-term slope stability shall exclude designs that require regular and periodic maintenance to maintain their level of function.

Finding: The project has been designed to avoid maintenance that could affect long-term slope stability and the design would not require regular or periodic maintenance to maintain slope stability.

A. Structures and improvements shall minimize alterations to the natural contour of the slope, and foundations shall be tiered where possible to conform to existing topography;

Finding: The proposal is to replace an existing, failing rockery wall. The proposed gravity block wall minimizes alterations to the natural contours and requires a smaller footprint as compared to the reconstructing a rockery wall.

B. Structures and improvements shall be located to preserve the most critical portion of the site and its natural landforms and vegetation;

Finding: The proposed project is located within the existing road right-of-way which has already been altered for the existing rockery. The replacement block wall has been designed to minimize impacts to natural landforms and vegetation adjacent to the right-of-way.

C. The proposed development shall not result in greater risk or a need for increased buffers on neighboring properties;

Finding: The project will result in stabilized slopes and will not pose a risk to the adjacent property owners (Critical Areas Report, Attachment 5). Neighboring properties will not require increased critical area buffers, as the properties are already encumbered by steep slope areas.

D. The use of retaining walls that allow the maintenance of existing natural slope area is preferred over graded artificial slopes where graded slopes would result in increased disturbance as compared to use of retaining wall;

Finding: The project has proposed a gravity block wall to minimize disturbance and grading of slopes.

E. Development shall be designed to minimize impervious surfaces within the critical area and critical area buffer;

Finding: The project has been designed to minimize impervious surfaces into the steep slope critical area. Minimum impervious surfaces are proposed that will still meet the requirements for the roadway and sidewalk improvements.

F. Where change in grade outside the building footprint is necessary, the site retention system should be stepped and regrading should be designed to minimize topographic modification. On slopes in excess of 40 percent, grading for yard area may be disallowed where inconsistent with this criteria;

Finding: Not applicable, proposal does not include buildings. The replacement block wall has been designed to minimize topographic modification.

G. Building foundation walls shall be utilized as retaining walls rather than rockeries or retaining structures built separately and away from the building wherever feasible. Freestanding retaining devices are only

permitted when they cannot be designed as structural elements of the building foundation;

Finding: Not applicable, proposal does not include building structures and foundations.

H. On slopes in excess of 40 percent, use of pole-type construction which conforms to the existing topography is required where feasible. If pole-type construction is not technically feasible, the structure must be tiered to conform to the existing topography and to minimize topographic modification;

Finding: Not applicable, proposal does not include building structures.

I. On slopes in excess of 40 percent, piled deck support structures are required where technically feasible for parking or garages over fill-based construction types; and

Finding: Not applicable, proposal does not include building structures.

J. Areas of new permanent disturbance and all areas of temporary disturbance shall be mitigated and/or restored pursuant to a mitigation and restoration plan meeting the requirements of LUC 20.25H.210.

Finding: Areas of permanent disturbance will be mitigated; the 38 trees removed from steep slope critical areas will be replaced with 76 trees planted in City-owned Eastgate Park. See Attachment 3. The tree replacement mitigation would infill native conifer trees in an area dominated by deciduous tree species; increasing species diversity, structural diversity, adding habitat niches and accelerating natural vegetation succession. Areas of temporary disturbance will be restored. The proposed mitigation and restoration meets requirements of LUC 20.25H.210. Final mitigation plans will be required for construction permit approval. **See Conditions of Approval in Section X of this report.**

IV. Public Notice and Comment

Application Date:	January 7, 2019
Public Notice (500 feet):	January 24, 2019
Minimum Comment Period:	February 7, 2019

The Notice of Application for this project was published in the City of Bellevue Weekly Permit Bulletin and Seattle Times on February 7, 2019. It was mailed to property owners within 500 feet of the project site. No comments or requests for information were received.

V. Summary of Technical Reviews

A. Clearing and Grading

The Clearing and Grading Division of the Development Services Department reviewed the proposal for compliance with Clearing and Grading codes and standards and has approved the application with conditions.

VI. State Environmental Policy Act (SEPA)

The environmental review indicates no probability of significant adverse environmental impacts occurring as a result of the proposal. The Environmental Checklist submitted with the application adequately disclosed expected environmental impacts associated with the project. The City codes and requirements, including the Clear and Grade Code, Utility Code, Land Use Code, Noise Ordinance, Building Code and other construction codes are expected to mitigate potential environmental impacts. Therefore, issuance of a Determination of Non-Significance (DNS) is the appropriate threshold determination under the State Environmental Policy Act (SEPA) requirements.

A. Earth and Water

The applicant will be required to obtain a clearing and grading permit and follow erosion and sediment control best management practices to prevent erosion impacts. Clearing and Grading Review has required rainy season restrictions to address potential erosion impacts. **See Conditions of Approval in Section X of this report**

B. Plants

Impacts to steep slope critical areas are limited to areas adjacent to the replacement wall. The proposal would remove 38 trees and plant 76 trees to mitigate for the impact.

VII. Changes to Proposal Due to Staff Review

Tree replacement mitigation was added as a change to the proposal following comments on the initial project proposal. There are limited opportunities to replace trees within the existing road right-of-way, so staff in the Parks Department, Transportation Department and Development Services Department concurred that tree planting could locate in the nearby City-owned Eastgate Park to mitigate for project impacts.

VIII. Decision Criteria

A. 20.30P.140 Critical Area Land Use Permit Decision Criteria – Decision Criteria

The Director may approve, or approve with modifications an application for a Critical Area Land Use Permit if:

1. The proposal obtains all other permits required by the Land Use Code.

Finding: All required construction permits will be obtained prior to commencing construction. **See Conditions of Approval in Section X of this report.**

2. The proposal utilizes to the maximum extent possible the best available construction, design and development techniques which result in the least impact on the critical area and critical area buffer.

Finding: Appropriate best management practices (BMPs) will be utilized throughout the construction process to ensure the least amount of disturbance to the steep slope critical area and to minimize construction impacts. Specific project BMPs are listed

in Section 7.0 of the Critical Areas Study (David Evans and Associates, Inc., January 2019)

Tree protection measures shall be employed to protect trees not specifically identified for removal during construction activity. **See Conditions of Approval in Section X of this report.**

3. **The proposal incorporates the performance standards of Part 20.25H to the maximum extent applicable.**

   Finding: The proposal incorporates the performance standards related to geologic hazard areas including steep slopes to the maximum extent applicable, as discussed in Section III above.

4. **The proposal will be served by adequate public facilities including street, fire protection, and utilities.**

   Finding: The project will be served by adequate public facilities.

5. **The proposal includes a mitigation or restoration plan consistent with the requirements of LUC Section 20.25H.210.**

   Finding: The proposal includes a mitigation plan consistent with the requirements of LUC 20.25H.210.

   A final mitigation planting plan shall be included with the clearing/grading permit and shall include performance standards to monitor the success of the mitigation planting. **See Conditions of Approval in Section X of this report.**

6. **The proposal complies with other applicable requirements of this code.**
   Finding: As discussed in this report, the proposal complies with all other applicable requirements of the Land Use Code.

IX. Conclusion and Decision

After conducting the various administrative reviews associated with this proposal, including Land Use Code consistency, City Code and Standard compliance reviews, the Director of the Development Services Department does hereby **approve with conditions** the replacement of an existing rockery wall along the east side of 150th Ave SE with an engineered gravity block wall.

Approval of this Critical Areas Land Use Permit does not constitute a permit for construction. Separate construction permits are required and all plans are subject to review for compliance with applicable City of Bellevue codes and standards.

Note- Expiration of Approval: In accordance with LUC 20.30P.150 a Critical Areas Land Use Permit automatically expires and is void if the applicant fails to file for a construction permit or other necessary development permits within one year of the effective date of the approval.

X. Conditions of Approval

The applicant shall comply with all applicable Bellevue City Codes and Ordinances including but not limited to:

Applicable Ordinances	Contact Person
Clearing and Grading Code- BCC 23.76	Tom McFarlane, 425-452-5207
Land Use Code- BCC Title 20	Peter Rosen, 425-452-5210

The following conditions are imposed under the Bellevue City Code as referenced:

1. **Clearing and Grading Permit Required:** Approval of this Critical Areas Land Use Permit does not constitute an approval of any construction permit. An application for a clearing and grading permit must be submitted and approved before construction can begin. Plans submitted as part of any permit application shall be consistent with the activity permitted under this approval.

   Authority: Land Use Code 20.30P.140
   Clearing & Grading Code 23.76.035
   Reviewer: Tom McFarlane, Development Services Department, Clearing & Grading Section

2. **Rainy Season Restrictions:** Due to steep slopes on the site, no clearing and grading activity may occur during the rainy season, which is defined as October 1 through April 30 without written authorization of the Development Services Department. Should approval be granted for work during the rainy season, increased erosion and sedimentation measures, representing the best available technology must be implemented prior to beginning or resuming site work.

   Authority: Bellevue City Code 23.76.093.A,
   Reviewer: Tom McFarlane, Development Services Department, Clearing & Grading Section

3. **Final Mitigation Plan:** A final mitigation planting plan shall be submitted with the clearing and grading permit. The plans shall specify plant species, sizes, quantities, spacing and notes to direct in-fill plantings to minimize impacts to existing vegetation. The final mitigation plan shall also include performance standards to measure the successful establishment of the mitigation plantings. The following performance standards are required:

   Year 1 (from date of plant installation)

   - 100% survival of all installed plants and/or replanting in following dormant season to reestablish 100%
   - Less than 5% cover of non-regulated Class A, B, or C noxious weeds as identified on the King County Noxious Weed List.
   - No (0%) regulated Class A, B, or C noxious weeds.

   Year 2 (from date of plant installation)

   - 90% survival of all installed plants and/or replanting in following dormant season to reestablish 90%
   - Less than 5% cover of non-regulated Class A, B, or C noxious weeds as identified on the King County Noxious Weed List.
   - No (0%) regulated Class A, B, or C noxious weeds.

   Year 3

   - Greater than 60% cover of installed and volunteer native plants.
   - Less than 10% cover of non-regulated Class A, B, or C noxious weeds as identified on the King County Noxious Weed List.
   - No (0%) regulated Class A, B, or C noxious weeds.

   Year 4

   - Greater than 75% cover of installed and volunteer native plants.
   - Less than 15% cover of non-regulated Class A, B, or C noxious weeds as identified on the King County Noxious Weed List.
   - No (0%) regulated Class A, B, or C noxious weeds.

   Year 5

   - Greater than 80% cover of installed and volunteer native plants.
   - Less than 15% cover of non-regulated Class A, B, or C noxious weeds as identified on the King County Noxious Weed List.
   - No (0%) regulated Class A, B, or C noxious weeds.

   Authority: Land Use Code 20.30P.140; 20.25H.220
   Reviewer: Peter Rosen, Development Services Department

4. **Maintenance and Monitoring:** The mitigation planting is required to be maintained and monitored for five years to ensure the plants successfully establish. Annual monitoring reports are required to be submitted to document the planting is meeting approved performance standards. Monitoring reports shall be submitted to the Environmental Planning Manager for the Land Use Division of Development Services. Monitoring reports must reference the project by name and include the relevant permit numbers.

   Authority: Land Use Code 20.30P.140; 20.25H.220
   Reviewer: Peter Rosen, Development Services Department

5. **Tree Protection:** The clearing and grading permit submittal shall show tree protection measures to protect trees not specifically identified for removal from impacts related to construction activity.

   Authority: Land Use Code 20.30P.140
   Reviewer: Peter Rosen, Development Services Department

Figure 6. Project Impacts to Steep Slope Areas

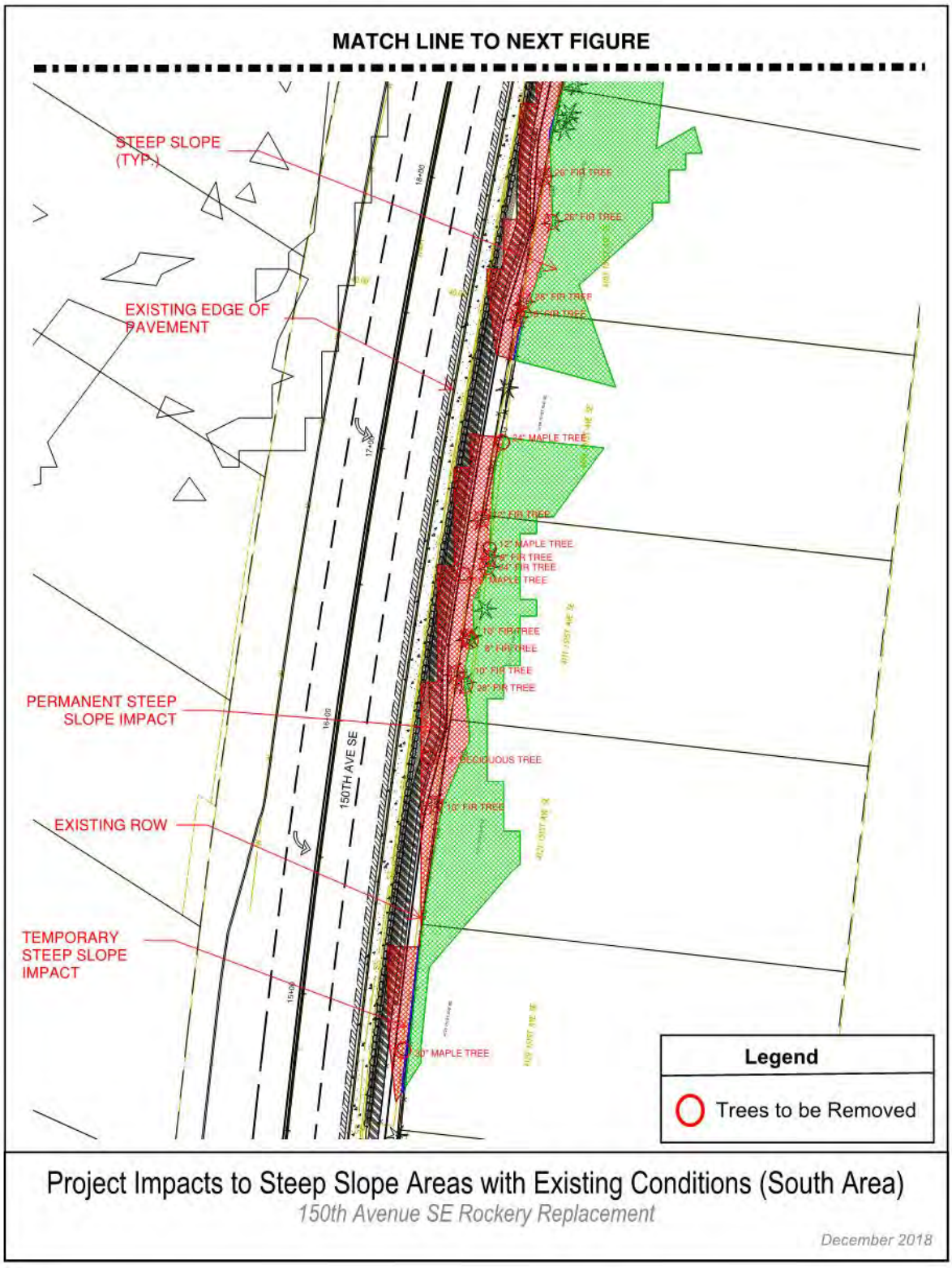


Figure 7. Project Impacts to Steep Slope Areas

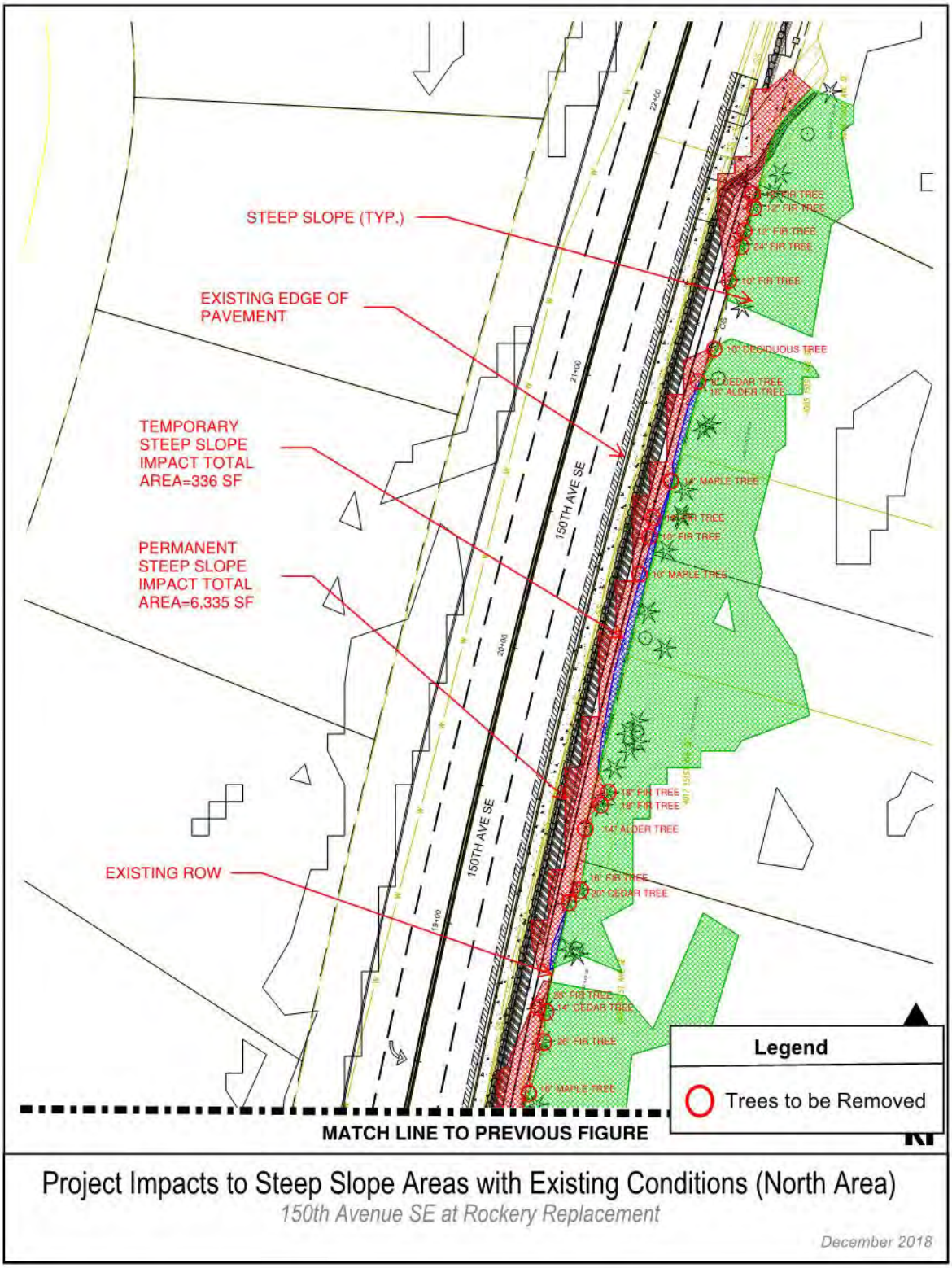


Figure 8. Significant Trees to be Removed within the Steep Slope

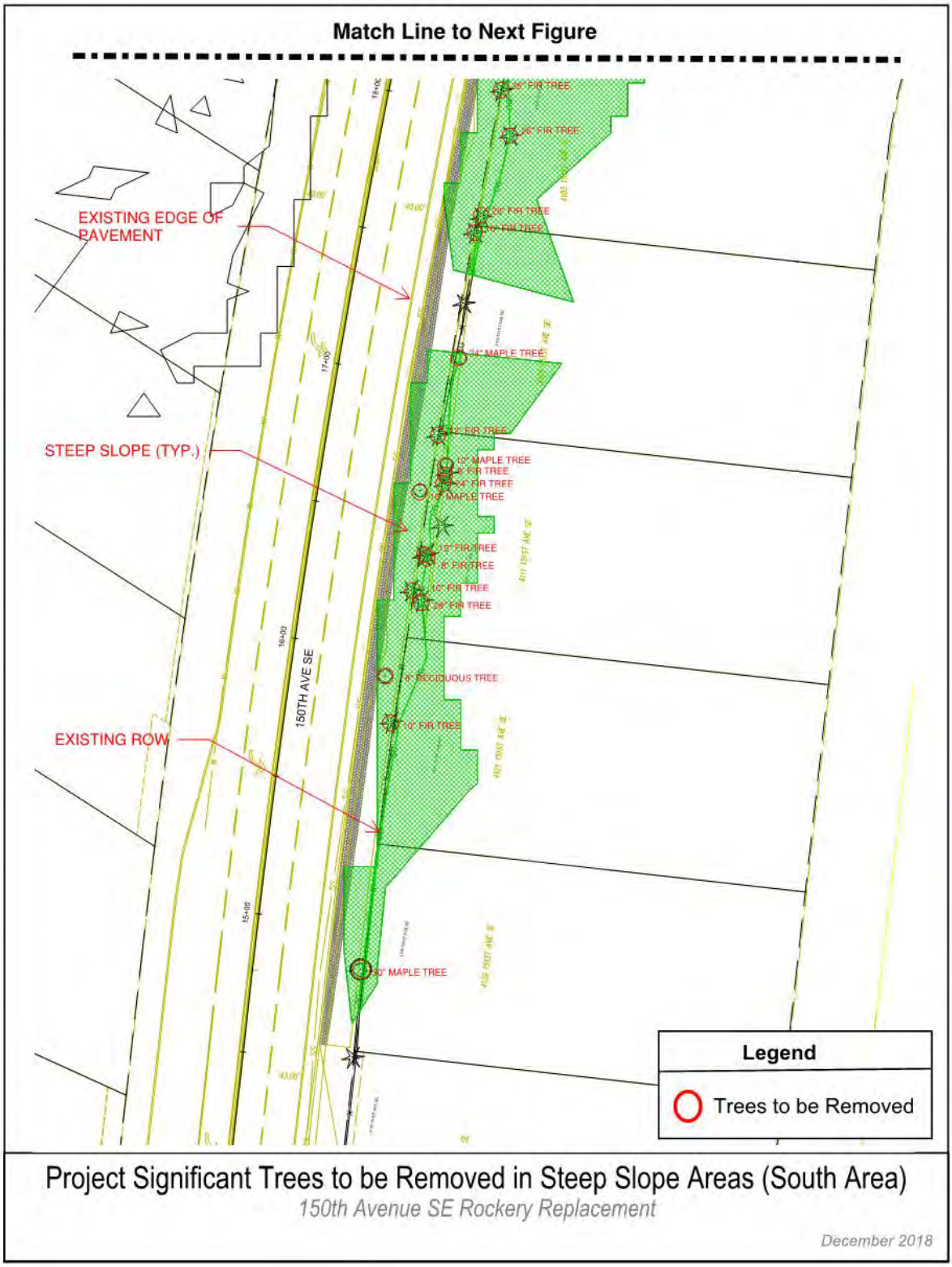


Figure 9. Significant Trees to be Removed within the Steep Slope

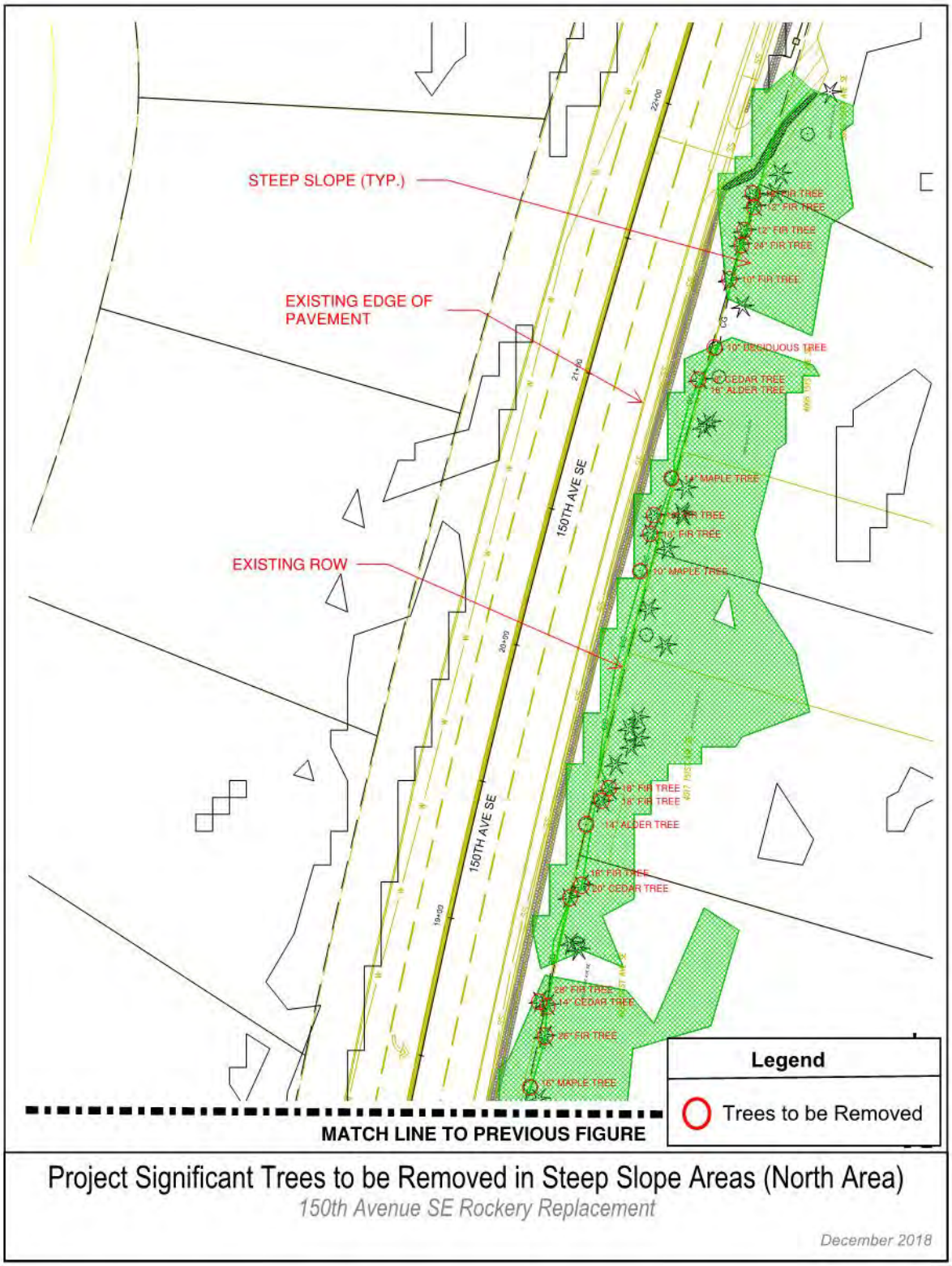


Figure 10. Proposed Conceptual Off-Site Mitigation for the Rockery Replacement (Eastgate Park)